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Attorneys for Plaintiff Chanel, Inc.

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

CHANEL, INC.,)	Case No. 2:11-cv-01508-KJD-PAL
)	
Plaintiff,)	NOTICE OF RECEIPT OF
)	COUNTERFEIT DISTRICT COURT
v.)	ORDER
)	
THE PARTNERSHIPS and)	
UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE "A" and)	
DOES 1-1000,)	
)	
Defendants.)	

At least one Defendant in this action has decided to take its counterfeiting scheme to an all new high. The Plaintiff, Chanel, Inc. ("Chanel"), by and through its undersigned counsel, hereby gives notice of receipt of a counterfeit district court order pertaining to Defendant 463, and states as follows:

1 1. On October 28, 2011, Chanel's undersigned counsel's office was contacted by Scott
2 McBreen, Domains Operation Manager at Name.com, the Registrar for the domain name
3 Chanelreplicabagshandbags.com (Defendant 463 herein) in connection with receipt of an order
4 purportedly entered in the case styled Chanel, Inc. v. The Partnerships and Unincorporated
5 Associations Identified on Schedule "A" and Does 594-1000, Case No. 2:10-cv-02684-BBD-dkv
6 (W.D. Tenn. 2011), entitled "Order Releasing the Subject Domain Name –
7 Chanelreplicahandbags.com." (the "Counterfeit Order") A true and correct copy of the Counterfeit
8 Order is attached hereto as Exhibit "A."

9 2. Mr. McBreen was attempting to effectuate the attached Fake Order which was provided to
10 Name.com via an email purportedly from Chanel's counsel's office. Although the document bears
11 Judge Donald's electronic signature, the purported order is in fact a fake and was not sent to
12 Name.com by Chanel's counsel. No such order was ever entered by the District Court in Tennessee,
13 nor is the domain name identified in the Counterfeit Order even at issue in that action.
14 Chanelreplicahandbags.com is, however, at issue in this action, although the domain name was not
15 actually identified as a part of this action until the filing of the First Amended Complaint and
16 Identification of Does 1-228 on November 8, 2011. Plaintiff reasonably believes Defendant 463
17 herein learned that it was about to be named as a Defendant in a lawsuit by Chanel at the time
18 Chanel's representative downloaded the applicable website pages from Chanelreplicahandbags.com
19 for use as an Exhibit in this action. Defendant 463 apparently speculated that it was to be added as a
20 Defendant in the Western District of Tennessee case and decided to proactively issue a counterfeit
21 order releasing the hold on Chanelreplicahandbags.com it believed would be forthcoming. While
22 Defendant 463 could have determined the IP address of the Chanel representative when the website
23 pages were downloaded, it could not have known in which litigation it would ultimately become a
24 Defendant. Thus, Defendant 463 issued its Counterfeit Order in the wrong case.

25 3. Counsel for Chanel has notified Name.com that the Counterfeit Order is non-genuine and
26 should be disregarded. Chanel has also notified Judge Donald's Chambers in the Western District
27 of Tennessee of the existence of the Counterfeit Order.

28 4. Chanel is filing this Notice to inform the Court of the existence of the attached Counterfeit

1 Order, as it concerns a domain name at issue in this action and there may well be other fake orders
2 bearing District Judge's signatures being circulated by the same Defendant counterfeiters who
3 prepared the attached document.

4 DATED this 8th day of November, 2011.

6 Respectfully submitted,

7 By: /s/ David S. Kahn
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